



U.S. Department of Justice

*United States Attorney  
Eastern District of New York*

*271 Cadman Plaza East  
Brooklyn, New York 11201*

December 16, 2024

**By ECF**

Honorable Marcia M. Henry  
United States Magistrate Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *Guan, et al. v. Mayorkas, et al.*, No. 19-cv-6570 (Chen, J.) (Henry, M.J.)

Dear Judge Henry:

This Office represents Defendants Alejandro Mayorkas, Secretary of the U.S. Department of Homeland Security (“DHS”); Troy Miller, Acting Commissioner of U.S. Customs and Border Protection (“CBP”); and Tae Johnson, Acting Director of U.S. Immigration and Customs Enforcement (“ICE”) (collectively, “Defendants”) in the above-referenced action. Defendants write on behalf of all parties pursuant to the Court’s Order dated November 15, 2024, requiring the parties to file a “status report informing the Court of the status of the settlement discussions” by December 16, 2024. *See* ECF Order dated Nov. 15, 2024.

The parties respectfully inform the Court that the parties’ settlement discussions have continued to progress in the last month and they believe that they are close to an agreement. However, given the number of interested parties, including the various agency officials and components responsible for reviewing and approving Defendants’ settlement position, the parties have not yet reached final agreement on all outstanding issues. As such, the parties respectfully request that the Court direct them to provide a further status update on the progress of settlement discussions by January 6, 2025.

The parties are also aware of the Court’s statement in the November 15, 2024 Order that, if the parties were to seek additional time in this status report, the Court would order the parties to appear at a status conference. Accordingly, the parties are available to appear for a status conference the week of January 6, or at such other time as may be convenient for the Court. While the parties are available to appear at a status conference, Defendants are hopeful that an agreement can be reached shortly, obviating the need for a status conference. Accordingly, to the extent an agreement is reached in advance of January 6, 2025, the parties request leave to update the Court as soon as practicable thereafter. The parties thank the Court for its consideration of this matter.

Respectfully submitted,

BREON PEACE  
United States Attorney

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cc: All Counsel (by ECF)